IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION

Gloria Nance-Williams,	Case No.: 2:20-cv-01584-DCN
)	
Plaintiff,)	
v.)	NOTICE OF REMOVAL
Target Stores, Target Stores, Inc.,	
Target Corporate Services, Inc. and	(JURY TRIAL DEMANDED)
Target Corporation,	,
)	
Defendants.)	

TO: THE UNITED STATES DISTRICT COURT:

Defendants, Target Stores, Target Stores, Inc., Target Corporate Services, Inc. and Target Corporation, would respectfully show the Court in support of its Notice of Removal that:

- 1. The Summons and Complaint in this action were filed on March 10, 2020 in the Court of Common Pleas for Dorchester County, South Carolina. Attached for the Court are copies of Plaintiff's Summons and Complaint. The Complaint is the first pleading served upon the Defendants in this action and service was affected on March 20, 2020. Therefore, removal is timely under 28 U.S.C. §1446(b).
- 2. The United States District Court has jurisdiction over this action pursuant to 28 U.S.C. §1332. The Plaintiff is a resident and citizen of the State of South Carolina; Defendants Target Stores, Target Stores, Inc., Target Corporate Services, Inc. and Target Corporation are organized and incorporated in the State of Minnesota and has its principal place of business in the

State of Minnesota. The action has been brought by the Plaintiff against the Defendant for the alleged accident which occurred in Dorchester County, South Carolina.

- 3. Venue is proper in this matter in the Charleston Division of this Court in accordance with 28 U.S.C. §1441(a).
- 4. Upon information and belief, the amount in controversy in this matter exceeds \$75,000.00 as Plaintiff alleges that as a result of a bottle of bleach falling from a shelf hitting her in the head, busting open and spilling onto her and the floor, she has suffered serious injury; great emotional upset and distress; pain and suffering; loss of enjoyment of life; actual damages; future damages; permanent impairment; punitive damages; legal costs; court costs; and Plaintiff's demand is \$120,000.00.
- 5. Defendant has filed no pleadings in this action with the Court of Common Pleas for the State of South Carolina in response to this Complaint; however, Defendant's Answer to the Plaintiff's Complaint is filed herewith contemporaneously.
- 6. Defendant has furnished a copy of this Notice of Removal to the Clerk of Court for Dorchester County.

Respectfully submitted,

SWEENY, WINGATE & BARROW, P.A.

s/ Mark S. Barrow
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ATTORNEYS FOR THE DEFENDANTS

Columbia, South Carolina

April 23, 2020